

INFORMATION TYPES

Information type	Sustainalytics' approach	Definition	Examples (<i>non-exhaustive list, for informational purposes only</i>)	Expectations from companies (<i>owners of the information shared with Sustainalytics</i>)	How Sustainalytics will use the information
Publicly available on a website	<p><i>Sustainalytics accepts</i> receiving such information from companies, to inform the following research or engagement products and services:</p> <ul style="list-style-type: none"> • Public ESG Risk Ratings • Corporate ESG Assessment • Stewardship Services • Corporate Governance Rating 	Published on website or as part of a filing available to the public at large	<ul style="list-style-type: none"> • Annual reports; CSR reports • Information included in official filings • Web site information, including: reports, policies, name, profile, professional experience, remuneration of corporate governance, financial information, group structure, etc. 	<p>Business as usual</p> <p>All the documents received by Sustainalytics will be treated as being publicly available</p>	<ul style="list-style-type: none"> • May be referenced in research deliverables, following the standards citation rules; • Small excerpts may be included in the external facing documents, provided that appropriate citation is in place.
Accessible upon request	<p><i>Sustainalytics accepts</i> receiving such information from companies, to inform the following research or engagement products and services:</p> <ul style="list-style-type: none"> • Public ESG RR • Corporate ESG Assessment • Stewardship Services 	Not published on the website, but the issuer will share them upon request to any third party who is asking for them	Policies, organizational chart, breakdowns/ details about the information available on the website, that are not published to avoid information fatigue and a visitor-friendly approach, but that the company is willing to share without restrictions	<p>Business as usual</p> <p>All the documents received by Sustainalytics will be treated as being publicly available</p> <p>The Company is expected to pro-actively inform Sustainalytics that the information can be disclosed upon request</p>	<ul style="list-style-type: none"> • May be referenced in research deliverables, following the standard citation rules; • Small excerpts may be included in the external facing documents, provided that appropriate citation is in place.

<p>Internal (non-material non-public)</p>	<p><i>Sustainalytics may accept</i> receiving such information from companies, if utmost necessary, to inform the following research or engagement products and services:</p> <ul style="list-style-type: none"> • Stewardship Services • Controversies • ESG RR 	<p>Information not published on the website, which the issuer may not share upon anyone’s request, which are not material (may not affect the price of the securities/ financial instrument), but that if widely disclosed may commercially affect the issuer.</p>	<ul style="list-style-type: none"> • Internal memos or reports • Internal policies (i.e. the comprehensive anti-money laundering policy – which if disclosed will enable potential offenders to identify the risk mitigation approach and avoid it; the discount policy) • Meeting minutes • Organizational charts (if not included in the above categories) • Methodologies • Draft reports • Business continuity plans 	<ul style="list-style-type: none"> • Any such information a company is willing to share with Sustainalytics, should be marked by the company as <i>Internal</i> • Internal information may be shared with Sustainalytics in the following format: <ul style="list-style-type: none"> ○ the name of the document ○ a table of content and/ or a summary ○ an excerpt of the relevant section in the document or a screenshot ○ share the information on screen 	<ul style="list-style-type: none"> • May be referenced in research deliverables, following the standard citation rules; • No excerpts may be included in the external facing documents • Such information is not shared outside Sustainalytics, in its client facing reports, however no confidentiality/ NDA will be signed between Sustainalytics and the company to cover such documents
<p>Confidential</p>	<p><i>Sustainalytics will not accept</i> receiving such information from companies, to inform the following research or engagement products and services:</p> <ul style="list-style-type: none"> • Stewardship Services • Controversies • ESG RR • Corporate Governance Rating 	<p>Information provided by either party to the other, by virtue of an existing contract, relating to its business activities and operations, its technical information and its trade secrets, all of which, including the terms of this Agreement, are proprietary and confidential to its owner; provided that the same are either identified as proprietary/confidential at the time of disclosure or should be understood by a reasonable person to be of a proprietary or confidential nature given the nature of the information and the context in which it is disclosed (definition in our contracts)</p>	<ul style="list-style-type: none"> • Business Contracts • Portfolios • List of clients, providers, business partners • Finance data if not disclosed on MNPI • Audit Reports, if not qualifying as material non-public information • New products under development, if not qualifying as material non-public information • Bond frameworks if not MNPI (i.e. a bond framework is likely not to be MNPI if the issuer is regularly issuing similar bonds, and a new issuance is unlikely to influence the price of the securities) • Corporate governance information if private company/ not disclosed already • Certain internal reports 	<p>Not applicable</p>	<p>Not applicable</p>

<p>Inside information/ MNPI</p>	<p><i>Sustainalytics will not accept</i> receiving such information from companies, to inform the following research or engagement products and services:</p> <ul style="list-style-type: none"> • Stewardship Services • Controversies • ESG RR <ul style="list-style-type: none"> • Corporate Governance Rating 	<p>Sustainalytics Key Business principles</p> <p>Material Information or inside information refers to any information that may have a positive or negative impact, that:</p> <ul style="list-style-type: none"> • Could be reasonably expected to have a significant impact on the market price of the company's securities; or, • Could be reasonably expected to be considered relevant by reasonable investors in their investment decision-making (i.e., to buy, sell, or hold securities) 	<ul style="list-style-type: none"> • Operating business performance • Changes in control and control agreements • Changes in management and supervisory boards • Changes in auditors or any other information related to the auditors' activity • Operations involving the capital or the issue of debt securities or warrants to buy or subscribe securities • Decisions to increase or decrease the share capital • Mergers, splits and spin-offs • Purchase or disposal of equity interests or other major assets or branches of corporate activity • Restructurings or reorganizations that have an effect on the issuer's assets and liabilities, financial position or profits and losses • Decisions concerning buy-back programmes or transactions in other listed financial instruments • Changes in the class rights of the issuer's own listed shares • Filing of petitions in bankruptcy or the issuing of orders for bankruptcy proceedings • Significant legal disputes • Revocation or cancellation of credit lines by one or more banks • Dissolution or verification of a cause of dissolution • Relevant changes in the assets' value • Insolvency of relevant debtors • Reduction of real properties' values • Physical destruction of uninsured goods • New licences, patents, registered trade marks • Decrease in value of patents or rights or intangible assets due to market innovation • Receiving acquisition bids for relevant assets • Innovative products or processes • Serious product liability or environmental damages cases • Withdrawal from or entering into new core business areas • Relevant changes in the investment policy of the issuer 	<p>Not applicable</p>	<p>Not applicable</p>
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